

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal Action No. 07-04

VANIVAN DEON FULLER,

Defendant.

**REDACTED****INDICTMENT**

The Grand Jury for the District of Delaware charges that:

**COUNT I**

From in or around July, 2005, and continuing up to on or about January 13, 2006, in the District of Delaware, and elsewhere, VANIVAN DEON FULLER, defendant herein, did knowingly conspire, with other indicted and unindicted co-conspirators known and unknown to the grand jury, to knowingly distribute, and possess with intent to distribute, more than five kilograms of a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A), all in violation of 21 U.S.C. § 846 and 18 U.S.C. § 2.

**COUNT II**

From in or around July, 2005, and continuing up to on or about January 13, 2006, in the District of Delaware, and elsewhere, VANIVAN DEON FULLER, defendant herein, did knowingly conspire, with other indicted and unindicted co-conspirators known and unknown to the grand jury, to commit an offense against the United States, that is, laundering of monetary instruments in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i); that is,

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VANIVAN DEON FULLER did knowingly conspire with persons known and unknown to the grand jury to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce – to wit, the delivery of currency from Delaware or Pennsylvania to Texas by Federal Express – which involved property that was the proceeds of specified unlawful activity – to wit, violations of 21 U.S.C. §§ 841(a)(1) (distribution of controlled substances) and 846 (conspiracy to distribute controlled substances) – with the intent of promoting the specified unlawful activity – to wit, the distribution of, and conspiracy to distribute, cocaine, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions, that is monetary instruments in the form of United States currency, represented the proceeds of some form of unlawful activity. In furtherance of the conspiracy, VANIVAN DEON FULLER, defendant herein, committed and caused to be committed, in the District of Delaware, the Eastern District of Pennsylvania, the Southern District of Texas, and elsewhere, the following overt acts, among others, that is, the delivery of currency by Federal Express package, which packages were shipped on or about the dates listed below, and which packages listed delivery addresses as set forth below,:

Overt Act	Date	Address	City	State	Zip Code
a	07/28/05	1710 Old Alvin Road	Pearland	TX	77581
b	08/03/05	7245 Scott St	Houston	TX	77021
c	08/08/05	5954 Westover St	Houston	TX	77033
d	08/09/05	12714 Sandhurst	Houston	TX	77048
e	08/09/05	6601 Sandpoint Dr	Houston	TX	77074
f	08/10/05	1710 Old Alvin Road	Pearland	TX	77581
g	08/10/05	3322 Yellowstone Blvd	Houston	TX	77021
h	08/15/05	5322 Botany St	Houston	TX	77048
i	08/15/05	5806 Bellcrest St	Houston	TX	77033
j	08/16/05	5014 Denoron	Houston	TX	77048
k	08/16/05	5811 Schevers St	Houston	TX	77023
l	09/02/05	3322 Yellowstone Blvd	Houston	TX	77021
m	09/09/05	411 West Road	Houston	TX	77038
n	09/27/05	4839 Red Bud St	Houston	TX	77033
o	09/28/05	4917 Wilmington St	Houston	TX	77077

Overt Act	Date	Address	City	State	Zip Code
p	10/10/05	5635 Elm Spring St	Houston	TX	77048
q	10/18/05	10610 Silverstone St	Houston	TX	77048
r	10/19/05	7307 Remegen St	Houston	TX	77033
s	10/20/05	5523 Heron St	Houston	TX	77033
t	10/24/05	4754 Penderson St	Houston	TX	77033
u	10/24/05	5125 Wilmington St	Houston	TX	77033
v	10/27/05	5004 Ricky St	Houston	TX	77033
w	10/27/05	5623 Bayfield St	Houston	TX	77033
x	10/31/05	5630 Simsdale St	Houston	TX	77033
y	10/31/05	7311 Hurtgen Forest St	Houston	TX	77033
z	11/07/05	5114 Westover St	Houston	TX	77033
aa	11/07/05	5237 Higgins St	Houston	TX	77033
bb	11/07/05	8103 Pam St	Houston	TX	77033
cc	11/09/05	4830 Teton St	Houston	TX	77033
dd	11/09/05	5623 Woodgreen St	Houston	TX	77033
ee	11/09/05	7603 Coffee St	Houston	TX	77033
ff	11/10/05	5334 Myrtlewood St	Houston	TX	77033
gg	11/16/05	5005 Richfield St	Houston	TX	77048
hh	11/21/05	10602 Silverstone St	Houston	TX	77048
ii	11/21/05	7351 Eisenhower St	Houston	TX	77033
jj	11/22/05	5715 Ricky St	Houston	TX	77033
kk	11/22/05	7315 Dunkirk St	Houston	TX	77033
ll	11/22/05	7938 Jutland St	Houston	TX	77033
mm	11/28/05	5639 Delmark St	Houston	TX	77033
nn	11/28/05	6043 Velneath St	Houston	TX	77033
oo	11/30/05	5623 Bayfield St	Houston	TX	77033
pp	12/01/05	7603 Coffee St	Houston	TX	77033
qq	12/06/05	11506 Sandrock St	Houston	TX	77048
rr	12/06/05	5242 Tavenor St	Houston	TX	77048
ss	12/21/05	6270 Selinsky St	Houston	TX	77048
tt	12/28/05	5803 Southmont St	Houston	TX	77033
uu	12/28/05	6170 Beldart St	Houston	TX	77033
vv	12/28/05	6510 Crestridge St	Houston	TX	77033
ww	01/05/06	5623 Bayfield St	Houston	TX	77033
xx	01/09/06	4632 Mayflower St	Houston	TX	77033
yy	01/09/06	5611 Graveton St	Houston	TX	77033
zz	01/10/06	5044 Wilmington St	Houston	TX	77033
aaa	01/10/06	5643 Rue St	Houston	TX	77033
bbb	01/12/06	5025 Mayflower St	Houston	TX	77033
ccc	01/12/06	5810 Velcrest St	Houston	TX	77033

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2 and

1956(h).

**COUNT III**

On or about January 13, 2006, in the Southern District of Texas, VANIVAN DEON

FULLER, defendant herein, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit the delivery of currency from Pennsylvania to Texas by Federal Express, which involved the proceeds of a specified unlawful activity, that is violations of 21 U.S.C. §§ 841(a)(1) (distribution of controlled substances) and 846 (conspiracy to distribute controlled substances), with the intent to promote the carrying on of specified unlawful activity, to wit, violations of 21 U.S.C. §§ 841(a)(1) (distribution of controlled substances) and 846 (conspiracy to distribute controlled substances), and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is monetary instruments in the form of \$96,040 in United States Currency, contained in two Federal Express packages, represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 2.

#### **NOTICE OF FORFEITURE**

Upon conviction of the controlled substance offense alleged in Count I of this Indictment, VANIVAN DEON FULLER, defendant herein, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations.

Upon conviction of one or more of the money laundering offenses alleged in Counts II and III of this Indictment, VANIVAN DEON FULLER, defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), the following property:

All right, title, and interest in any and all property involved in each offense in violation of Title 18, United States Code, Section 1956, or conspiracy to commit such offense, for which the defendant is convicted, and all property traceable to such property, including the following: 1) all money or other property that was the subject of each transaction, transportation, transmission or transfer in violation of Section 1956; 2) all commissions, fees and other property constituting proceeds obtained as a result of those violations; and 3) all property used in any manner or part to commit or to facilitate the commission of those violations.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

Foreperson

COLM F. CONNOLLY  
United States Attorney

BY: Douglas E. McCann

Douglas E. McCann  
Assistant United States Attorney

Dated: January 9, 2007